

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**CASELAS, LLC,**

**Plaintiff**

**v.**

**HEARTLAND PAYMENT  
SYSTEMS, LLC,**

**Defendant**

**Case No. 2:22-cv-0090 JRG-RSP**

**Consolidated Lead Case**

**JOINT MOTION FOR ENTRY OF PROPOSED AGREED PROTECTIVE ORDER**

Plaintiff Caselas, LLC and Consolidated Defendants Heartland Payment Systems and Barksdale Federal Credit Union (collectively the “Parties”) respectfully submit the attached Proposed Agreed Protective Order for entry in these consolidated cases. The attached Proposed Order is stipulated by the Parties, and entry is respectfully requested.

The Proposed Order is attached hereto.

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Dated: August 9, 2022

Respectfully Submitted,

/s/ M. Scott Fuller

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**CERTIFICATE OF CONFERENCE**

The undersigned confirms that a meet and confer was conducted with opposing counsel, and that opposing counsel agrees with the relief sought herein.

/s/ M. Scott Fuller

M. Scott Fuller

**CERTIFICATE OF SERVICE**

I certify that on August 9, 2022, I served counsel for Plaintiff by electronically filing the foregoing document with the Clerk of Court using the CM/ECF system in accordance with the Federal Rules of Civil Procedure.

/s/ M. Scott Fuller

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